

RECOVERED OIL / WASTE MANAGEMENT PLAN HOUMA INCIDENT COMMAND

Version 6

INCIDENT NAME: MC 252

TYPE & AMOUNT: CRUDE OIL >87,000 BBLs (as of 5/10/10 on ICS 209)

SPILL – LOCATION: MC 252 Incident

SPILL – DATE/TIME: 22 April 2010 2215

Approved by: RPIC-_____

FOSC-_____

SOSC-_____

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Section I. Incident Background

This plan is written at the request of the Incident Commander, the U.S. Coast Guard (USCG) FOSC and the State of Louisiana SOSC. This plan will cover over-arching oil recovery and waste management issues relating to the incident which includes the following activities; oil skimmed off of the water, oil collected from absorbents, decontamination (*Decontamination of vessels, equipment and personnel are addressed in the MC252 Vessel Evaluation & Decontamination Plan- see **Appendix C***), shore line impact cleanup and wildlife rehabilitation. The Houma incident command center will be the area covered under this plan. This plan is to cover oil spill clean-up activities associated with the Deepwater Horizon rig incident where the source point originated in Mississippi Canyon Block 252 of the Gulf of Mexico.

The Responsible Party will abide by all applicable state, local and federal laws and regulations while implementing this plan.

SECTION II. WASTE IDENTIFICATION / CHARACTERIZATION

The following identified categories of material are covered in this plan. Volumes of these types of materials will be difficult to determine due to circumstances associated with the oil spill containment operation and will be updated daily on the ICS 209 form (**See Appendix D**).

1. Crude oil skimmed/collected from the water and spill source (Reclaimable/Recyclable oil, E&P Waste)
2. Shore line material collected that is contaminated with crude oil, once drained of practically recoverable oil (E&P Waste/Industrial Waste)
3. Decontamination fluids from cleaning response vessels, reusable boom, and other such containers contaminated with crude oil (Reclaimable/Recyclable oil, E&P Waste)
4. Non Oil Contaminated general waste such as trash collected from response vessels responding to crude spill event, and material associated with Shore line operation (Municipal Waste)
5. Medical waste associated with wildlife rehabilitation or staging areas (Medical Waste)
6. Dead Wildlife (United States Wildlife and Fisheries/ and Louisiana Department of Wildlife and Fisheries to coordinate)

SECTION III. WASTE MANAGEMENT APPROACH

Given the complexity of the anticipated landfall of this material and various staging areas the plan is designed to allow for the crude oil contaminated material to be disposed of at E&P exempt facilities under the authority of the Louisiana DNR, and permitted industrial solid waste disposal facilities regulated under the authority of the Louisiana DEQ. Each staging area will have predetermined approved locations to take this material. The approved locations, profiling requirements including sampling requirements are included in **Appendix A** (Houma IC Approved Facilities).

An overall strategy will be employed to reclaim or recycle as much oil as practical prior to having the spill material sent for disposal.

Heritage Environmental is the selected contractor charged with the proper handling of these recovered material prior to reclaim/recycle or disposal. Heritage has been tasked with the following activities:

- ◆ Sourcing waste containers and transportation at the decontamination/staging areas
- ◆ Segregating, labeling and correctly storing wastes
- ◆ Sampling waste containers in order to characterize wastes, as needed
- ◆ Completing profiles at approved disposal sites (BP or waste contractor approved see **Appendix A**)
- ◆ Completing Waste Manifests for waste sent offsite for disposal
- ◆ Tracking of wastes volumes collected and transported.

In addition to the above Heritage responsibilities, BP has authorized and delegated Heritage to sign Waste Manifests. The Waste Manifest Signature Delegation Agreement is **Appendix B** of this plan.

SECTION IV. OIL RECOVERING / WASTE HANDLING

The following actions are anticipated to occur in handling this oily recovered material.

1. Segregate oil reclaim/recycle material and waste streams, as much as practical, into the waste/ recovery types listed in **Appendix A**
2. Designated Heritage Waste Coordinator at each staging area will label containers appropriately with "BP", MC 252 Event, waste type and start date of accumulation.
3. Waste containers and transportation from the staging area will be provided by Heritage Environmental Services.
4. Upon arrival of waste to the dock or shoreline operations will contact the closest Waste Coordinator to request container or location of waste collection area. See **Appendix A**, and Section V. for details of locations.
5. Industrial wastes/ E&P wastes for disposal in landfill will be profiled and signed by BP or delegated Heritage Waste Coordinator as authorized by BP Waste Specialist with the appropriate receiving disposal/recycling facility prior to shipment offsite.
6. All wastes requiring manifesting will be manifested appropriately according to State and Federal requirements and tracked on a spreadsheet Heritage provides to keep the ICS 209 form up to date.
7. Heritage Waste Coordinator will track all manifests on behalf of BP
8. Options are currently being evaluated and considered for oil recovery and re-use.

Each staging area will be equipped with a sufficient supply of DOT-approved containers and with sufficient back-up DOT-approved containers. All containers will have liners, and for extra precaution absorbent material will be placed at the door seams. Each container will be clearly labeled with the appropriate waste stream. Once waste begins to be accumulated within a container, the container shall be labeled with the accumulation start date. The label indicating what is within the container shall remain in place and legible. Once accumulation begins within a container the Heritage Waste Coordinator shall arrange to have the backup container in place. All measures will be taken to ensure we have no less than two days worth of containers on site for each waste stream. At all times containers with waste associated with the MC-252 incident will be covered (tarped) when not in use. Under normal circumstances, roll-off containers (when full) will be taken off site within a 24 hour time frame. However, the MC-252 daily activities and logistics could extend the holding period.

Each staging area will be manned with at least one each of the following people during operating periods:

- Security Personnel
- BP Personnel (or the equivalent)
- Heritage Environmental Waste Coordinator

Upon receiving the waste at the waste segregation area, BP and Heritage Waste Coordinator will place or supervise the placement of the waste into the appropriate containers. Once a container is considered full, the Heritage personnel shall ensure that the container is properly covered and labeled for transportation. Transportation shall be arranged by the Heritage waste

coordinator. If the waste is transported under a manifest rather than a Bill of Lading, the manifest shall be signed by BP personnel or their authorized Heritage designees.

Only contracted BP clean-up contractors shall be allowed to bring waste to the staging areas. If others attempt to deposit non-spill related waste at the staging areas they shall be immediately turned away by security personnel.

SECTION V. WASTE MANAGEMENT LOCATIONS / STAGING AREAS

The following staging areas are currently identified and may change frequently upon clean-up conditions in the locales needed the most.

Staging Area	Shipping Address	Heritage Waste Coordinator	Cell #
Venice	339 Coast Guard Rd Venice, LA 70091	Greg Buettner	(314) 575-4286
Hopedale	7222 Hopedale Highway Hopedale, LA 70085	John Dillon	(913) 593-6086
Slidell Area	Highway 90E @ Pearl River Slidell, LA 70458	Dan Hans	(918) 671-5572
Grand Isle	103 Caminada Lane Grand Isle, LA 70358	Scott Yocum	(304) 281-4404
Cocodrie	106 Pier 65 Chauvin LA 70344	Billy Farris	(205) 306-3507
Fourchon	570 Dudley Bernard Road Golden Meadows, LA 70357	Jim Davis	(724) 581-7335
Franklin	272 Louisiana Road Franklin, LA 70538	John Dillow	(816) 591-0457
Houma Incident Command	1597 Hwy 311 Schriever, LA 70395	Ricky Belk David Bush Scot Lawson	(918) 629-1324 (281) 380-2217 (419) 466-7571

The currently approved Oil Recovery/ Recycling and disposal locations are identified in the attached **Appendix A** and capabilities are summarized below:

Oil Recovery Company Mobile Facility Info

Mobile Operation can process a total of 100,000 gallons per day of waste water at the facility in Mobil. Oil would have to be stored separately to be transported to 3rd party recyclers. The terminal has a 200' bulkhead wide X 400' long with a 10-12 foot draft for barge access. Property can store up to 20 frac tanks for oil saltwater is not a problem in facility tankage.

Hydrocarbon Recovery Services Inc (FCC) Facility Info

FCC New Orleans facility is permitted to process 50,000 gallons per day in the plant and can offer barge access, which would need to be unloaded by truck to the facility. Facility processes as it receives and can except 6 to 8 full loads per day and up to 15 full loads per day on a modifies schedules.

RiverBirch Avondale Landfill facility Info

The RiverBirch Avondale Landfill has an estimated 10,927,000 yards of air space available. On a 12 hour a day 7 day a week schedule the facility has the capability to except 500 trucks a day for an estimated volume of 15,000 yard per day, or on a 24 hour a day 7 day a week schedule the facility can except 1000 trucks a day for an estimated volume of 30,000 yards.

Allied Sorrento Landfill Facility Info

Allied Colonial Landfill has an estimated 46 years of life remaining at the site. Current remaining capacity is 13,062,155 cubic yards of available space. Facility can except 250 loads of material per day under normal operations but has the capability to open for longer hours and weekends as well. Facility can also handles up to 25 loads per day of liquids for solidification. In additional for extra capacity and securing of readily available resources there are two additional storage yards loaded with additional disposal boxes and frac tanks for easy shuttling into active staging areas. These include:

Preheat / Omni Dock (For Venice area staging)

501 Tidewater Road
Venice, La. 70091

Trussco Dock (for Grand Isle/ Fourchon / Cocodrie area staging)

186 17th Street
Golden Meadow, La. 70357

SECTION VI. TRANSPORTATION

Approved transporters will be used from the staging areas identified in section V. to the approved destination facilities identified in **Appendix A**. All transporters of recovered oil and solid waste generated as a result of the oil spill will be registered solid waste transporters with the LDEQ.

SECTION VII. FINAL DISPOSITION OR DISPOSAL

The ICS 209 form (**Appendix D**) will be used to track the disposition of wastes and recovered product as it relates to this incident. Manifest tracking will be used at each staging area and rolled up to one combined at the Houma Incident Command Environmental Unit by Heritage Environmental.

SECTION VIII. HEALTH AND SAFETY CONSIDERATIONS

Health and Safety considerations will be covered under the Site Safety Plan (**See Appendix E**) at each of the staging areas. Employees handling waste are HAZWOPER and DOT trained. Along with the site safety plans, a detailed decontamination plan addresses the concerns of decontamination and the transfer of this material to a recovered product or waste that is addressed in this plan. Decontamination activities are present at the Venice and Port Fourchon Staging Areas.

Only contracted BP clean-up contractors shall be allowed to bring waste to the staging areas. If others attempt to deposit non-spill related waste at the staging areas they shall be immediately turned away by security personnel.

SECTION IX. QUALITY ASSURANCE

Waste management oversight at staging area operations will be performed out of the Houma Incident Command Environmental Unit. Daily call ins will occur at each site for collection of waste/recovery volumes, general flow of material, and any other issues that may arise from the operations of managing these areas as it relates to waste.

SECTION X. COMMUNITY RELATIONS

Community relations are vital to the handling of this unfortunate situation. With this in mind, a Community Volunteer/Outreach plan has been developed and is being implemented at the staging areas. In addition, there will be a post and copies available to immediate surrounding public at each staging area describing operations, potential hazards as it relates to oil spill material, and contact information for further questions. This plan was also used in the planning and securing of these locations.

SECTION XI. Plan Submittal & Revision Tracking

Submitted by:

Tracy Dyer/Jerry Harrington

DATE: 5/11/10

Developed by: Tracy Dyer	Revised: 4/22/10 03:30
Revision 1	
Updated by: Jerry Harrington	Revised: 4/23/10 15:45
Revision 2	
Updated by: Kathy McCormick	Revised: 4/29/10 14:00
Revision 3	
Updated by: Kathy McCormick	Revised: 4/30/10 14:00
Revision 4	
Updated by: Maribeth Dobbins	Revised: 5/02/10 03:00
Revision 5	
Updated by: Tracy Dyer	Revised 5/04/10 18:00
Revision 6	
Updated by: Jerry Harrington	Revised 5/06/10 07:00
Revision 7	
Updated by: Jerry Harrington	Revised 5/08/10 07:30
Revision 8	
Updated by: Jerry Harrington	Revised 5/08/10 16:30
Revision 9	
Updated by: Jerry Harrington	Revised 5/09/10 08:30
Revision 10	
Updated by: Curtis Hartsook	Revised 5/14/10 11:00
Revision 11	
Updated by Curtis Hartsook	Revised 5/15/10 16:40
Revision 12	
Updated by Curtis Hartsook	Revised 5/17/10 10:25
Revision 13	

APPENDIX A

Waste Chart

APPENDIX B

Waste Manifest Signature Delegation Agreement

APPENDIX C

Vessel Evaluation & Decontamination Plan

APPENDIX D

ICS 209

APPENDIX E



ICS 208 – MSRC Site Safety and Health Plan

1. Project Objective			
Prepared by:	Chris Muzzy	Date:	5/3/2010
Overall Objective of Project:		SHORELINE PROTECTION AND CLEANUP OPERATIONS	
1) To ensure the safety of all responding personnel and mitigate risk. 2) To protect and contain/recover shoreline impacts of discharged oil.			
2. Site Description			
Date:	5/3/2010	Sector:	Sector New Orleans and Sector Mobile
Business Unit:	N/A		
Name of Facility:	N/A		
Location (Road, City):	BP - Mississippi Canyon Blk 252 – Specific Location:		
Potential Hazards (Y, N):			
	Y	Excavations, Trenches, and/or Confined Spaces	
	Y	Hazardous Vapors and Gases	
	Y	Direct Exposure to Hazardous Material	
	Y	Dust and Particulates/Respiratory Concerns	
	Y	Temperature Extremes – Heat Stress	
	Y	Equipment Hazards – Oil spill response equipment and boat ops	
	Y	Other:	Water based recovery ops
Area Affected: (Describe the area including approximate dimensions. Attached Site Map)			
Land based shoreline and near shore/inland waterways. Plan developed in preparation for potential impacts from Galveston, TX to Tampa, FL.			
Surrounding Population (Y/N): No			
		Urban	SEE SPECIFIC SITE PLANS FOR DETAILS
		Suburban	SEE SPECIFIC SITE PLANS FOR DETAILS
		Rural	SEE SPECIFIC SITE PLANS FOR DETAILS
Distance to Nearest Population:		Varies with each site but generally the potential exists for populated areas of residence and/or recreation to be affected.	

Topography: (Describe terrain)		Varied types of shoreline – sandy beach, marsh and tidal flats, bays, rivers and canals.
Climate/Weather Conditions:		Refer to Daily Weather Reports
3. Background Information		
Background information: (Include date, range of site use, source of contamination, estimated extent of contamination, known and suspected contaminants, etc.)		
4/21/10 – Well blowout and fire on semi-submersible MODU “Deepwater Horizon.” Rig sunk, condition of well unknown. Crude Oil (refer to Crude Oil MSDS and Dispersant 9527 and 9500 MSDS) – Shoreline impact.		
4. Entry Objectives		
Entry Objectives: (Fully describe the purpose of site visit(s). If multiple visits, indicate the objectives of each entry. The number and types of samples should be included if sampling is to be performed).		
Primary focus on the booming and recovery operations of impacted shorelines. Separate SSSP's have been developed to address operating areas.		
5. Personnel Roles		
RP Personnel:	SEE COMMAND ASSIGNMENT LIST	
Key Personnel	Title / Responsibilities	
See specific location organization chart.		
Contract Personnel		
See Org Chart for Other Organizational Assignments		
6. Site Security And Control		
Security Team Leader:	CONTRACTED 3 RD PARTY SECURITY AT EACH STAGING AREA	

MSRC:		Phone:	
Contractor:		Phone:	
Control Boundaries:	OFFSHORE AT WATERLINE AND POINTS OF BEACH OR LAND ACCESS AS APPLICABLE		
Map:	Sketch attached (Y/N):		
Site:	Secured (Y/N):		
A Safe perimeter has been established as:			
STAGING AREA AND LANDSIDE BEACH ACCESS POINTS.			
No Unauthorized Person Should Be Within This Area			
Control boundaries have been established and the Exclusion Zone and Contamination Reduction Zone have been identified and designated. Ensure safety briefings cover this specific detail.			
SEE SITE SPECIFIC PLAN FOR INDIVIDUAL CONTROL BOUNDRIES AT EACH LOCATION.			
Note: See attached Site Map.			
Spill Containment Procedures:			
Well still uncontrolled. Site Assessment and air monitoring will be conducted prior to MSRC resources engaging in recovery operations. Site assessment documentation to be attached as necessary.			
NOTE: Reference the Action Procedure of the site Incident Management Plan (IMP)			
7. Hazard Evaluation			
The following substance(s) are known to be on site. The primary hazards of each are identified.			
Product	Physical State ¹	Waste Characteristics ²	Primary Hazard ³
Crude Oil - Sweet	Liquid	Flammable	Inhalation / Ingestion / Absorbtion
Dispersant 9527	Liquid	Non Regulated	Dermal
Dispersant 9500	Liquid	Non Regulated	Drmal
¹ – Liquid, solid, sludge, gas/vapor, other.			
² – Corrosive, flammable, toxic, volatile, reactive, radioactive, carcinogen, other.			
³ – Toxic on inhalation or ingestion, absorbed through skin (dermal), irritant to eyes, irritant to respiratory tract, irritant to skin, other.			
NOTE: Also – Refer to the PROPER Material Safety Data Sheets (MSDS's)			
Anticipated concentration and allowable exposure limits			
Product	Anticipated Concentration	Full-Shift Exposure Limit	Short-Term Exposure Limit
Crude Oil	N/A	See MSRC Air Monitor Sheet	See MSRC Air Monitor Sheet

NOTE: Include institution that establishes limit (e.g., OSHA PEL, NIOSH REL, ACGIH TLV, etc.).			
MSRC levels for evacuation are as follows: O2 – 19.5-23, LEL 10%, H2S 10ppm, CO 25 ppm, VOC/TPH 50 ppm, Benzene .5 ppm.			
Other Site Hazards (Y, N):		SEE SITE SPECIFIC PLANS FOR ADDITIONAL HAZARDS	
8. Personal Protective Equipment			
Based on evaluation of potential hazards, the following levels of personal protection have been designated for the applicable work areas and tasks. See Health Hazard Information section on MSDS of product in Appendix C.			
Location	Job Function	Level of Protection	
SHORELINE CLEANUP	Recover oil.	Level D (see below)	
PPE – Levels of protection:			
Level A: To be selected when the greatest level of skin, respiratory and eye protection is required.			
Level B: The highest level of respiratory protection is necessary but a lesser level of skin protection is needed.			
Level C: The concentration(s) and type(s) of airborne substance(s) is known and the criteria for using air purifying respirators are met.			
Modified Level D: Tyvek suit, inner and nitrile or PVC outer gloves, steel toe boots with over-booties or the like, safety glasses, hard hat.			
NOTE: See 29 CFR 1910.120 Appendix B for more detailed information in regard to levels of protection.			
Specific protective equipment for each level of protection is as follows:			
Hard hats, safety glasses, steel toed boots, Personal Floatation Device as required, Tyvek suit and inner/outer nitrile or neoprene gloves when engaged in oil. PFD required when working within 10' of a water depth of 3 feet or more or as directed by the on scene safety officer.			
If level C is required due to airborne hydrocarbon concentrations, an air purifying respirator with combination cartridges WILL BE UTILIZED AT THE APPROVAL AND DIRECTION OF THE MSRC H&S MANAGER AND RESPONSE MANAGER.			
Identify PPE Equipment Supply Source			

MSRC provided for MSRC personnel, contractors to supply their own. IC to determine if mutual agreement is made.

9. Environmental Monitoring

If at any time a measurement of greater than 0% L.E.L. is observed or greater than benzene or VOC limits, the workers will retreat to a safe area. Monitoring will be continuous as instructed by the IC.

Combustible Gas Monitoring will be conducted by: LEL explosive monitoring; PIC to designate

Instrument(s) used will be: IBRID MX6

Calibration Frequency: 30 days, bump tested prior to use.

Frequency of Monitoring: Continuous as directed

Location of Monitoring: All active recovery sites

Benzene monitoring will be conducted by:

Instrument(s) used will be: Draeger CMS or Benzene Tubes

Calibration Frequency: Daily before use

Frequency of Monitoring: Initial: Once at each location, twice at initial assessment, any time PID over 5 PPM
Continuous: Monitor hourly

Location of Monitoring:

Other monitoring will be conducted by:

Instrument(s) used will be: IBRID MX6 – LEL, O2, H2S, CO, VOC's

Calibration Frequency: Daily before use

Frequency of Monitoring: Initial: Once at each location, twice at initial assessment, any time PID over 5 PPM
Ongoing: Monitor hourly

Location of Monitoring:

Personal Monitoring for Hydrocarbons:

NOTE: Other gases shall be monitored as required per the Safety Officer, IC, or RP.

Identify Monitor Equipment Supply Source

MSRC provided for MSRC personnel, contractors to supply their own.

10. On-Site Work Plans

Tactical responders will perform the following tasks:

Task

Shoreline oil recovery operations, skimmers, boom, boat operations.

11. Special Instructions

Communicate with Site Safety Officer about any hazards observed not listed in Site Safety Plan. Site Safety Technicians will be roving throughout field to conduct safety compliance checks and air monitor readings.

12. Communication Procedures

The following emergency signal indicates that there is an emergency situation:

Primary	MSRC VHF Radio CH 1	Horn blasts	
Secondary	Cell phones	Siren	
		Alarm	
		Whistle	

In addition, the following standard hand signals will be used in case of failure of audible communications:

- | | |
|--------------------------------|---|
| • Hand gripping throat | ⇒ Out of air, can't breath |
| • Grip partner's wrist or both | ⇒ Leave area immediately hands around waist |
| • Hands on top of head | ⇒ Need assistance |
| • Thumbs up | ⇒ OK, I understand |
| • Thumbs down | ⇒ No, negative |

13. Decontamination Procedures

A 3-Stage Personal decon station will be established at every applicable deployment/recovery location.

See attachment.

14. Emergency Procedures

The following standard emergency procedures will be used by on-site personnel. The Site Safety Officer shall be notified of any on-site emergencies and will be responsible for ensuring that the appropriate procedures are followed:

Personnel injury – Medic available at each staging area.

Fire/Explosion – Evacuate area and notify Command.

Personal Protective Equipment Failure – Report all incidents to Safety Officer for documentation and direction.

Other Equipment Failure – Same.

In All Situations, When an On-Site Emergency Results in Evacuation of the Work Area, Personnel Shall Not Re-Enter Until:

1. The conditions resulting in the emergency have been corrected.
2. The Safety Officer has given the approval.
3. The hazards have been reassessed.
4. The Site Safety Plan has been reviewed.
5. Site personnel have been briefed on any change in the Site Safety Plan.

An exit route will be used in an emergency restricting the use of the main entrance.

Location of the Emergency Exit Route (See Site Map):

In the event of an accidental release, fire or explosion or the sounding of the emergency signal, workers will evacuate the work area and assemble in the designated location.

Location of Designated Assembly Area (See Site map):

15. Site Safety Plan

Site Safety Officer(s):

The Site Safety Officer is directly responsible for safety recommendations on site. He/she will maintain daily site logs documenting all notable events and/or conditions of health and safety concerns.

Emergency Medical Care:

See ICS 206 - Medical Plan

Qualified Medical personnel are located on site (Y/N):

Yes

**Medic
onsite at
each
staging
area**

	If there are qualified Medical personnel located on-site, then identify location (See Site Map):	
Medical Surveillance:	See MSRC records as necessary (on file)	
In accordance with 29 CFR 1910.120 (f), the employee/contractors involved in this project have been examined by a physician trained in occupational medicine, for the purpose of determining fitness with respect to handling hazardous materials and wearing personal protective equipment. The results of the examination indicate that these employees/contractors are physically capable and qualified to work under conditions described in this plan, without risk to personal health and safety.		
Emergency Resources: Medic onsite at each staging area – Local EMS available as referenced in SSSP's.		
Incident Post Phone Number:		
	NOTE: Telephone communication to the Command Post should be established as soon as practical.	
16. Training Certification		
The Safety Officer will ensure that all employees have the appropriate training/certification as per 29 CFR 1910.120 .		